



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

May 26, 2015

MICHAEL KASPER, TREASURER
DEMOCRATIC PARTY OF ILLINOIS
P.O. BOX 518
SPRINGFIELD, IL 62705

Response Due Date
06/30/2015

IDENTIFICATION NUMBER: C00167015

REFERENCE: AMENDED YEAR-END REPORT (11/25/2014 - 12/31/2014), RECEIVED
05/04/2015

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 5 item(s):

1. Schedule H3 of your report discloses a transfer(s) in from a non federal account(s) for "2014 Fall Event 09-23-14 (09/23/2014)" which appears to exceed the permissible amount(s) indicated by your allocation ratio for this activity/event. Please be advised that transfers for allocated activity must not exceed the non federal share of the joint disbursements and that these transfers must be made within a 70 day time period: no more than 10 days before or 60 days after payment to the vendor. Please clarify the nature of this transfer(s) in from the non federal account. (11 CFR §§106.6(e)(2) and 106.7(f)(2))

The Commission recommends that you immediately transfer the total excessive amount received by your federal account back to your non federal account. Although the Commission may take further legal action concerning this prohibited activity, your prompt action will be taken into consideration.

2. Schedule H4 supporting Line 21(a) of your report discloses a payment(s) for "Payroll taxes". Please be advised that pursuant to 11 CFR §300.33(c)(2), salaries and wages for employees who spend more than 25% of their compensated time in a given month on Federal Election Activity (FEA) or activities in connection with a Federal election must not be allocated between or among federal and non-federal accounts. Rather, only federal funds may be used. Further, the Commission concluded in Advisory Opinion 2003-11 that

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amounts spent for employee-specific "fringe benefits," consisting of health insurance, disability insurance, life insurance, retirement benefits and payroll taxes, fall into the category of compensated time.

Please clarify whether this activity is for employees who spent 25% or less of their time during the month(s) referenced above on FEA or activities in connection with a Federal election. If this is not the case, any reimbursement from your committee's non-federal account for this payment is not permissible and must be returned. Although the Commission may take further legal action regarding any improper allocation activity, your prompt action will be taken into consideration.

3. Schedule H5 of your report discloses a \$70,354.10 transfer(s)-in of Levin funds to your federal account for Get Out the Vote activity. However, you have failed to include a Schedule L and L-B to disclose the transfer(s)-out of Levin funds for this activity. Please amend your report to clarify this apparent discrepancy.

4. Schedule H5 discloses a \$389,826.39 transfer-in of Levin funds to your federal account for generic campaign activity. However, Schedule L-B supporting Line 4(d) of the Schedule L Aggregation Page for the "Democratic Party of IL Non Federal" account discloses a \$460,360.49 transfer(s)-out of Levin funds for this activity. Please amend your report to clarify this apparent discrepancy. (11 CFR §300.36)

5. Your amended report fails to disclose receipts of Levin funds previously disclosed on your Year-End Report, received 4/7/15. Please be advised that when amending an electronically filed document, you must submit a complete version of the report, rather than just those portions that are being amended. Please resubmit your report to include any omitted activity or provide clarifying information as to why this information was omitted from this amended report. (11 CFR §104.18(f))

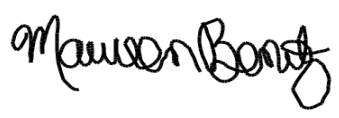
Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

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Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1147.

Sincerely,

A handwritten signature in black ink, appearing to read "Maureen Benitz". The signature is fluid and cursive, with the first name "Maureen" written in a larger, more prominent script than the last name "Benitz".

Maureen Benitz
Sr. Campaign Finance & Reviewing Analyst
Reports Analysis Division